

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MELISSA OSTRANDER, Plaintiff)

v.)

HUSSMANN CORPORATION,
Defendant)

CIVIL ACTION NO. 04-30197-MAP

DEFENDANT'S MOTION TO ENLARGE TIME FOR COMPLETION OF DISCOVERY
AND RESCHEDULE FINAL PRE-TRIAL CONFERENCE DATE
(ASSENTED TO)

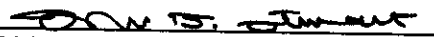
Now comes the defendant and respectfully requests the court to enlarge the time to permit the parties to complete additional discovery and to reschedule the final pre-trial conference, now scheduled for February 9, 2006, until April or May, 2006. As grounds, the defendant states that additional time is necessary to consider one additional lay deposition, to complete expert designation and for expert depositions to take place. The plaintiff's counsel has suggested, and the defendant agrees, that deposition of plaintiff's liability expert Wilson Dobson ought to take place the court issue an interlocutory order of summary judgment in defendant's favor on the plaintiff's warnings-based claims. (The court has scheduled a hearing on defendant's motion for partial summary judgment on the warnings claims on January 30, 2006).

Accordingly, the defendant requests the court to endorse the following amended schedule for the completion of discovery:

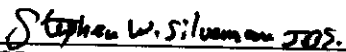
Additional lay deposition and enforcement of records subpoenas	February 10, 2006
Designation of defense experts	February 10, 2006
Completion of Expert Depositions	April 14, 2006
Final Pre-Trial Conference	On or After April 14, 2006

WHEREFORE, the defendant respectfully requests the court to allow additional time for completion of discovery as set forth above.

HUSSMANN CORPORATION,
Defendant

By 
JOHN B. STEWART
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ASSENTED TO:


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"I HEREBY CERTIFY THAT A TRUE COPY OF THE
FOREGOING DOCUMENT WAS SERVED UPON EACH
PARTY APPEARING PRO SE AND THE ATTORNEY
OF RECORD FOR EACH PARTY BY MAIL, (IN HAND)

ON DEC. 23, 2005

